

as Chairman of various campaign divisions of the United Way Campaign in San Antonio. My activities in connection with the United Way Campaign have included service on the Campaign's Admissions Committee, which screens potential new member organizations seeking to receive funds from the Campaign. Among the various divisions of the Campaign which I have chaired is the new business division, for which I was responsible in 1977. That division seeks to obtain the participation of companies not currently participating in the campaign either through an employee drive or through direct contributions from the company. In 1977, I successfully obtained new business division contributions 1200% in excess of those obtained during the previous year.

I also served between 1967 and 1974 as a founding member of the Board of the Ecumenical Center for Religion and Health. The Ecumenical Center is a non-profit organization the purpose of which is to educate, counsel and advise individuals and families experiencing marital difficulties or problems associated with terminal illness or severe sickness. During my association with the Ecumenical Center, I participated in all aspects of its establishment, including raising funds for the construction of its building, setting its policy, hiring its staff, and determining the nature of the activities in which it would engage. The Ecumenical Center is now a viable operating public service agency

affiliated with San Antonio's Medical Center and funded largely by private contributions.

I have also served as a member of the Board of the Temple Beth-El from 1959 to the present. Temple Beth-El is the Temple which I attend. I served as president of the Temple Beth-El congregation between 1961 and 1963. While serving as president, I initiated and completed the first remodeling of the Temple in the 37 year history of the 1000 family congregation, raising approximately \$500,000 to accomplish the remodeling. I also established during my tenure a remodeling and replacement fund for the Temple so that the Temple could be maintained in good condition in future years.

Between 1966 and 1973, I served as one of six Commissioners on the Board of Commissioners of the Urban Renewal Agency of San Antonio. I was appointed to this position by the Mayor of San Antonio. I attended meetings of the Board of Commissioners approximately once per week during the period in which I served on the Board. The Board of Commissioners was San Antonio's first Urban Renewal Agency. During my tenure on the Board, we accomplished the clearing of numerous blighted areas of San Antonio, the construction of new housing in those areas, the renovation and reclamation of numerous properties, and the acquisition of the property in the downtown area of San Antonio which was ultimately used to construct facilities for the 1968 World's Fair held in San

Antonio, HemisFair. Another accomplishment of the Board during my tenure was to conceive and construct an extension of San Antonio's "Riverwalk" facilities to the San Antonio Convention Center complex. This project significantly enhanced the attractiveness of San Antonio for tourists and the convention trade.

In 1967, I was appointed by San Antonio's Mayor to serve on the San Antonio Committee for Desegregation. This committee was composed of approximately eight members, and its purpose was to accomplish the desegregation of all public hotels and restaurants in San Antonio. At that time, there still existed a number of hotels and restaurants in San Antonio which refused to serve black persons. Our committee contacted every hotel and restaurant in San Antonio and informed them of City policy that discrimination against blacks would not be tolerated. In each instance, the committee determined whether the particular hotel or restaurant in question intended to comply fully with the nondiscrimination policy. With respect to restaurants and hotels which resisted the policy, we took further action. We scheduled individual meetings, made personal calls, and made it plain in a variety of ways to each of the hotels and restaurants that any discrimination by them against blacks would not be tolerated in San Antonio. The result was that all of the recalcitrant business establishments--with possibly one exception--agreed to alter their practices and

to abide by a strict policy of providing nondiscriminatory service to all persons.

In addition to the activities I have mentioned, I have served on numerous Boards and Committees of San Antonio civic, community and religious organizations. In 1968, I served as Vice Chairman of the Executive Committee of HemisFair, the World's Fair held in that year in San Antonio. In that capacity, I participated in planning and staging HemisFair in 1968. Prior to 1968, I was substantially involved in the process of planning for HemisFair both through my affiliation with the Chamber of Commerce and through the ad hoc citizens committee of local community leaders which participated in preparations for the Fair. I also served as Chairman of the committee which was responsible for passing the referendum which raised the \$5.5 million necessary to construct the Tower of the Americas, the theme structure of the Fair. In approximately 1971 through 1974, I served as a Member and Vice Chairman of the San Antonio Bicentennial Committee. I was appointed to this position by the Mayor of San Antonio. As Vice Chairman, I participated in the planning and coordination of local activities conducted in connection with the National Bicentennial in 1976.

During the years 1961 through 1967, I served as a member of the San Antonio Joint Airport Zoning Board. I was appointed to this position by the Mayor of San Antonio. The

purpose of the Board was to oversee San Antonio airport facilities so as to prevent any incursion on air traffic safety at the airport. During the years 1960 through 1963, I served on the Board of Trustees of Saint Mary's University in San Antonio. Between 1966 and 1967, I served as a member of the Board of Directors of the San Antonio Symphony Society. Between 1967 and 1969, I served as a member of the Board of Directors of the South West Research Foundation. The South West Research Foundation is a nationally recognized biomedical research facility located in San Antonio. It is a nonprofit organization funded by private and governmental grants. In serving on the Foundation's Board of Directors, I participated in setting policy for the foundation and determining which scientists working at the foundation should be granted tenure.

In 1958, I served as Chairman of the Citizens' Building Committee of the Northeast Independent School District. This affiliation arose as a consequence of the fact that my children were then attending this particular school district. I was appointed as Chairman of the Committee by the School Board of the District, and I worked with the committee to successfully plan and present to the citizens a referendum to authorize a bond issue. The funds from the bond issue were used to construct a new high school in the district. Between the years of 1967 and 1969, I served as a member of the Advisory Board of the Baptist Memorial Hospital in San

Antonio. During the period of my service, a new wing of the hospital was completed and dedicated. In 1950, I served as President of the San Antonio Executives Association.

In 1986, I served as General Campaign Chairman of the Jewish Federation of San Antonio. During the Campaign, I devoted approximately 4 to 5 hours per week to performing the duties of Chairman, including organizing the Campaign, recruiting the workers, and supervising the Campaign's fund drive. Funds raised by the drive are used to support local charities in which the Jewish community is involved and also to support the National American Jewish Appeal. I also served on the Board of the Jewish Federation of San Antonio in 1985, and on its Executive Committee during the years 1985-1986. In 1987, I acted as Treasurer for the Annual National Jewish Center for Immunology and Respiratory Medicine dinner. The proceeds of this annual dinner are contributed to the National Jewish Center for Immunology and Respiratory Medicine, which is located in Denver, Colorado. I have served on the committee which oversees the annual dinner for the past fifteen years.

Awards and Citations

Over the years, I have received a number of awards and citations as a consequence of my participation in civic and community activities and my actions in operating KONO(AM)/KITV(FM) and later KONO-TV. Some of the awards I

have received are described below and in attachments to this declaration.

I received the Printers Ink Silver Medal Award, presented in 1964 by the San Antonio Advertising Club. A brochure describing the basis upon which this award was bestowed, and a photocopy of the award itself, are included as Attachment 2 to this declaration.

I received a letter of appreciation dated September 23, 1979 and a plaque expressing appreciation for my service on the Board of Trustees of the South West Texas Public Broadcasting Council. Photocopies of this letter and plaque are included as Attachment 3 to this declaration.

In 1953, I received the Radio Advertising Bureau's Outstanding Salesman Award. I also received an award dated May 16, 1963 from the General Federation of Women's Clubs and the San Antonio Women's Federation for responsibility and service to the community in connection with my operation of KONO-TV. A photocopy of this award is included in Attachment 4 to this declaration.

I have received numerous additional citations and awards, including citations from the City of San Antonio in recognition of my service on the Committee on Desegregation, the Committee on Education and Retraining, the Board of Commissioners of the Urban Renewal Agency, and the Joint Airport Zoning Board. Attachment 5 to this declaration describes some of these additional awards and citations and

contains copies of several citations, awards, and letters of commendation which I have received.

Other Media Interests

Fredericksburg Channel 2 has no media interests. I am the President and 20% stockholder in San Antonio Channel 2, Inc., permittee of low power television station K02MX, San Antonio, Texas. If Fredericksburg Channel 2 receives a construction permit in this proceeding, Station K02MX will be taken off the air on or before the date on which Fredericksburg Channel 2's full power station on Channel 2 in Fredericksburg, Texas commences operations, as I understand would in any event be required under FCC rules.

Auxiliary Power

Fredericksburg Channel 2 intends to acquire an auxiliary power generator for use in the connection with its proposed station.

Federal Aviation Administration Clearance

Fredericksburg Channel 2 has received a "Determination of No Hazard to Air Navigation" from the Federal Aviation Administration with respect to its proposed tower at a height above ground of 1,018 feet. Attachment 6 to this declaration is a copy of the FAA Determination of No Hazard to Air Navigation.

I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, recollection and belief.

Bob A. Roth
Bob A. Roth

Dated: Feb 25th, 1988

CERTIFICATE OF SERVICE

I, Lula Parker, hereby certify that I have this 22nd day of July, 1994, sent by U.S. Postal Service, postage prepaid, or caused to be hand delivered, copies of the foregoing "COMMENTS OF FREDERICKSBURG CHANNEL 2" to the following:

Ronald D. Maines, Esq.
Maines & Harshman, Chrtd.
Suite 900
2300 M Street, N.W.
Washington, D.C. 20037

Dan J. Alpert, Esq.
1250 Connecticut Avenue, N.W.
Seventh Floor
Washington, D.C. 20036

Robert Lewis Thompson, Esq.
Pepper & Corazzini
1776 K Street, N.W.
Suite 200
Washington, D.C. 20006

David M. Silverman, Esq.
Cole, Raywid & Braverman
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006

Jeffrey D. Southmayd, Esq.
Southmayd & Miller
1220 19th Street, N.W.
Suite 400
Washington, D.C. 20036



Lula Parker